

Bridger Pipeline LLC

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RECEIVED

JUN 14 2017

Office of Enforcement, Compliance
and Environmental Justice (Water)

June 13, 2017

U.S. Environmental Protection Agency Region 8
Attn: Darla Hohman (8ENF-W-WO)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Section 308 Request for Information; NRC Report No. 1105969

Dear Ms. Hohman:

In response to your Request for Information dated May 11, 2017 Bridger Pipeline, LLC offers the following responses numbered in accordance with your request. Files referenced below can be found on the enclosed thumb drive.

1. Item 1 response:

Sub items A. and B.: Appendix A includes a listing of all data points received by the control center from the Poplar system. Each item includes a description followed by the tag name, the data type, the range and set points, if any, as well as any pertinent comments.

Sub Item C.: Appendix B is a copy of the relevant procedures regarding calibration and the calibration intervals. Although the actual date of the inspections vary from year to year, all devices that are considered overpressure protection or safety devices are calibrated each year in the spring. Note that the interval by code allows for up to 15 months to accommodate weather and other field conditions that may affect our ability to perform the inspections and calibrations.

2. **Item 2 Response:** Appendix C is a schematic of the system showing each of the items requested in sub items a. through h.
3. **Item 3 Response:** Item 3 requests Process and Instrumentation Diagrams (P&ID). Bridger does not maintain P&IDs rather we maintain Protective and Control Device diagrams (P&CD). Appendix D contains the P&CDs for Richey, Glendive and Baker (Poplar System). Please note that although Cabin Creek is in

the vicinity of the Poplar line it is not and has not ever been connected to or a part of the Poplar Pipeline.

Sub Item A. Response: Richey station includes two pumps model 4X11 DA-6 driven by electric motors. The pump curve on these two pumps is included in Appendix E. Glendive includes two positive displacement (PD) pumps so no centrifugal pump curve is associated with those. One is an FMC Model 1122 Triplex and the other is a Gaso model Duplex 1700. The Glendive pumps are also electric driven. There are no pumps on the Poplar system located at Baker.

Sub Item B. Response: Appendix C contains the requested tank information.

4. **Item 4 Response:** Appendix F (a-h) includes SCADA traces for each of the items for the period requested with the following exceptions.

There are no temperature readings being gathered at either the Yellowstone River North Block Valve (item c. ii.) or the Yellowstone River South Block Valve (item d. ii.)

The pressure readings being recorded on SCADA for Gas City Injection (Item E. ii.) and Denbury Injection (Item F. ii.) are located at the production site, not at the junction with the mainline.

We do not operate any tanks at Gas City Injection (Item E. iii.) or Denbury Injection (Item F. iii.) and do not receive tank level information through our SCADA system.

As noted in response to Item 3 above the Cabin Creek site (item g.) is not a part of the Poplar system and as such we did not provide that data.

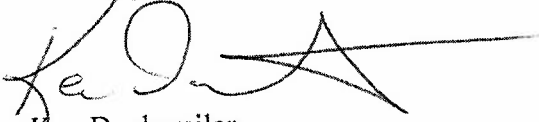
Baker station and the tanks associated therewith are part of the Butte Pipeline system not the Poplar system so no tank information is gathered at Baker station relative to the Poplar Pipeline operations.

5. **Item 5 Response:** Bridger's SCADA system does include an alarm logger and Appendix G includes a file of alarms from OWS 1 (operating work station 1) for the period requested. Unfortunately our system does not readily allow for the format requested in item 5.A. Given the 30 day timeline allowed for in the RFI we are unable to provide the data in the requested format, but we trust that you will find the format we provided to be adequate for your purposes. The nomenclature on the alarm tags is typically "SYSTEM_STATION_EQUIPMENT.status". The exception is for Line Balance alarms as it will show "SYSTEM_LNB_SEGMENTSTART_SEGMENTEND.status".

6. **Item 6 Response:** Appendix H includes a description of the leak detection system and the ladder logic diagrams from the SCADA system that determine leak alarms. Appendix J contains the relevant operating procedures effective on January 17th, 2015.
7. **Item 7 Response:** Appendix K contains the DNV-GL root cause analysis report in its entirety.
8. **Item 8 Response:** Appendix L contains several "reports" from Ballard Marine Construction related to the spill.
9. **Item 9 Response:** The total amount spent on replacing the Yellowstone River Crossing with the new HDD crossing was \$2,262,298. That total includes materials of approximately \$230,000 and labor of approximately \$1,850,000. The remaining amounts include engineering and design, landowner damage reimbursements, hydrotest water, and other miscellaneous items.

Should you have any questions, feel free to contact me at 307-266-0275 or by e-mail at ken.dockweiler@truecos.com.

Sincerely,



Ken Dockweiler
Director, Land, Government and Compliance
Bridger Pipeline LLC

Enclosure: as noted

STATEMENT OF CERTIFICATION

I certify under the penalty of law, that I am familiar with the information submitted in this document and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the information in this document is true, accurate and complete. I am aware that there are significant penalties for submitting false information.

Robert B Dundas
Signature

6/13/17
Date

Robert B Dundas

Printed Name

Environmental Coordinator –
Bridger Pipeline LLC

Title and Name of Company